

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA : DATE FILED: _____
v. : CRIMINAL NO. _____
LARRY NICHOLSON, a/k/a : VIOLATIONS: 18 U.S.C. § 1347
KENNETH WALKER (Health Care Fraud -
4 Counts)

I N D I C T M E N T

COUNTS ONE THROUGH FOUR

THE GRAND JURY CHARGES THAT:

At all times material to this Indictment:

1. The Philadelphia Macaroni Company, doing business as Conte Luna Foods (referred to below as Conte Luna Foods), 40 Jacksonville Road, Warminster, Pennsylvania, manufactured food products.

2. The Hartford, a division of The Hartford Financial Services Group, Hartford Plaza, Hartford, Connecticut, provided private medical benefits to corporations and their employees through Workers Compensation insurance policies.

3. Conte Luna Foods contracted with The Hartford for a health care benefit program for employees injured on the job (referred to below as The Hartford health care benefit program).

4. In or about November 1997, defendant LARRY NICHOLSON secured a job at Conte Luna Foods under the fake name Kenneth Walker.

5. On or about December 8, 1997, defendant LARRY NICHOLSON, using the fake name Kenneth Walker, claimed he hurt himself while working at Conte Luna Foods.

6. Between in or about December 1997 and in or about April 1998, defendant LARRY NICHOLSON, using the fake name Kenneth Walker, sought medical care for these alleged work-related injuries under The Hartford health care benefit program.

7. During the course of his medical treatment under The Hartford health care benefit program, defendant LARRY NICHOLSON provided the fake name of Kenneth Walker to his doctors (the "treating physicians") and falsely told them that he had suffered no prior work related injuries, when, in fact, NICHOLSON had previously sought medical treatment and Workers Compensation benefits for injuries allegedly suffered during prior jobs under both his real and fake names.

8. The Hartford paid defendant LARRY NICHOLSON under the fake name Kenneth Walker \$10,758.91 for lost wages at Conte Luna Foods, and paid \$13,855.94 to doctors who provided defendant NICHOLSON with medical benefits, items, and services under the health care benefit plan.

9. On or about the dates listed below, in the Eastern District of Pennsylvania and elsewhere, defendant

LARRY NICHOLSON, a/k/a KENNETH WALKER

knowingly and willfully executed and attempted to execute a scheme to defraud a health care benefit program, that is, The Hartford health care benefit program, in connection with the delivery of and payment for health care benefits, items and services, by concealing his true name and complete and accurate medical history, which included prior injuries allegedly suffered while working for other employers under both his real and fake names, as set forth below:

<u>COUNT</u>	<u>DATE</u>	<u>DESCRIPTION</u>
1	3/20/1998	Medical report by Dr. Robert D. Aiken concerning defendant LARRY NICHOLSON, a/k/a KENNETH WALKER. Defendant NICHOLSON caused this report to be false by seeking treatment under a fake name and misrepresenting his medical history.
2	5/5/1998	Medical report by Dr. Carol Ludolph concerning defendant LARRY NICHOLSON, a/k/a KENNETH WALKER. Defendant NICHOLSON caused this report to be false by seeking treatment under a fake name and misrepresenting his medical history.
3	6/9/1998	Check in the amount of \$185.91 issued by The Hartford to Dr. Carol Ludolph for her medical report dated 5/5/1998 concerning defendant LARRY NICHOLSON, a/k/a KENNETH WALKER. Defendant NICHOLSON caused this report to be false by seeking treatment under a fake name and misrepresenting his medical history.

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7/14/1998

Check in the amount of \$156.74 issued by The Hartford to Dr. Robert Aiken for his medical report dated 3/20/1998 concerning defendant LARRY NICHOLSON, a/k/a KENNETH WALKER. Defendant NICHOLSON caused this report to be false by seeking treatment under a fake name and misrepresenting his medical history.

All in violation of Title 18, United States Code,
Section 1347(1).

GRAND JURY FOREPERSON

PATRICK L. MEEHAN
United States Attorney